

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

Midland Funding LLC,)	CASE NO.: 3:08-cv-01434
)	
Plaintiff,)	JUDGE: DAVID A. KATZ
)	
vs.)	
)	
Andrea Brent,)	IT IS SO ORDERED
)	
Defendant,)	
)	/s/ David A. Katz
vs.)	David A. Katz, Senior Judge
)	
Midland Credit Management, Inc.)	
)	
Third-Party Defendant)	
)	

**Plaintiff and Third-Party Defendant's
Motion to File its Motion for Summary Judgment
Under Seal**

Now come Plaintiff, Midland Funding, LLC ("Midland"), and Third-Party Defendant, Midland Credit Management, Inc. ("MCM"), by and through undersigned counsel, and pursuant to Local Rule 5.2, request leave to file their motions for summary judgment, with accompanying exhibits, under seal. In support of this motion, Midland and MCM state the following:

- Local Rule 5.2 requires a party to obtain a court order prior to filing a sealed document – otherwise, "the document will not be filed under seal."
- On October 7, 2008, this Court signed a Stipulated Protective Order entered into by each party, upon representation that confidential material deserving of protection would likely be exchanged during the course of discovery. Doc. No. 20.
- On December 31, 2008, this Court signed a "Stipulation and Order Concerning Non-Waiver of Certain Attorney-Client Communications," upon representation that certain material